

EXHIBIT 7

From: Strapp, Michael
Sent: Wednesday, January 19, 2011 8:16 AM
To: 'Kirstin Stoll-DeBell'; Eric R. Chad
Cc: LawsonService; Erica_Haggard@vaed.uscourts.gov; ML-EPlus Goodwin Team; cmerritt@cblaw.com; dabney.carr@troutmansanders.com
Subject: RE: Revised Set of Dr. Shamos Slides

Kirstin,

We have now had an opportunity to complete our review of the revised set of Dr. Shamos's demonstrative slides that you provided us last night at 8:30 p.m. Notwithstanding our two-hour meeting yesterday in the afternoon, several of Dr. Shamos's slides are still problematic and, in several instances, violate prior Court Orders. Additional detail regarding the problematic slides follows:

JCON + PO Writer slides -- Although Dr. Shamos's report does not contain claim-by-claim or element-by-element obviousness allegations with respect to JCON & PO Writer and is, in total, a single paragraph of Dr. Shamos's report, Dr. Shamos's revised set of slides include several slides that detail on a claim-by-claim and element-by-element basis JCON & PO Writer obviousness opinions for each asserted claim on an element-by-element basis that were not disclosed in Dr. Shamos's expert report. See Slides 99-104, 107-110, 124-128, 131, 137-145.

TV/2 + RIMS slides -- Although Dr. Shamos's report does not contain claim-by-claim or element-by-element obviousness allegations with respect to TV/2 & RIMS and only spans 8 conclusory paragraphs, Dr. Shamos's revised set of slides include several slides that detail on a claim-by-claim and element-by-element basis TV/2 & RIMS obviousness opinions for each asserted claim on an element-by-element basis that were not disclosed in Dr. Shamos's expert report. See Slides 40-43, 45-46, 48-54, 56-58, 60-66, 68-69, 71, 73, 75, 77-80, 82-85, 87-88, 90.

The support for Dr. Shamos's opinions in his slides do not match up with the support for those same opinions disclosed in Dr. Shamos's report. See Slides 80, 83, 139 and 156.

Dr. Shamos offers a legal opinion on claim construction or that are inconsistent with the Court's claim construction. See Slides 64, 87, 90, 141 and 145.

Dr. Shamos improperly cites the specification of the patents-in-suit as prior art. See Slides 69, 85 and 88.

Dr. Shamos offers a legal opinion regarding secondary considerations that was not fully disclosed in his expert report. See Slide 163.

Sincerely,

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